

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reassessment of Federal Communications	)	
Commission Radiofrequency Exposure	)	ET Docket No. 13-84
Limits and Policies	)	
	)	
Proposed Changes in the Commission's	)	ET Docket No. 03-137
Rules Regarding Human Exposure to	)	
Radiofrequency Electromagnetic Fields	)	

To the Commission:

**REPLY COMMENTS OF JAMES EDWIN WHEDBEE, M.P.A., M.Ed.  
TO PRIVATE CITIZENS ALLEGING HEALTH CLAIMS DUE TO R.F. EXPOSURE**

Comes now, JAMES EDWIN WHEDBEE, undersigned, who pursuant to Sections 1.415 and 1.419 of the Commission's rules and regulations file these reply comments to the comments of private citizens alleging health claims due to radiofrequency radiation exposures.

1. None of the commenters have provided a nexus between exposure to radiofrequency emissions and their claimed health conditions, nor have the commenters who allege ill health due to R.F. emissions ruled out any other proximate cause for their health conditions. None of the commenters who claim medical expertise in these proceedings have demonstrated concurrent competence in radiofrequency engineering or electromagnetic spectrum physics sufficient to draw an expert opinion establishing a nexus between the claimed medical conditions and radiofrequency emissions. Therefore, while the undersigned regrets to learn of the commenters'

unfortunate ailments, beyond speculation, none has established a well-grounded claim of an illness, disability, or ailment directly or secondarily attributable to radiofrequency emissions.

2. Apart from mere speculation, none of the medical evidence provided throughout these dockets provides a nexus between radiofrequency emissions and a medical condition, either directly or secondarily. Medical evidence merely establishes a well-known fact: radiofrequency emissions heat body tissues. So does a furnace. Direct contact between body tissues and high-power output radiofrequency transmitters can cause burns. Again, such would also be the case for touching a heater coil on the stove. This evidence is insufficient to establish that the proximate cause for any other acute or chronic medical condition is radiofrequency radiation. The evidence establishes what any two year old child knows: if it is hot, don't touch it. Common sense in both cases overrules the need for regulation, and foolishness in the handling of radiofrequency transmission systems is a self-limiting problem: i.e., the user's own lack of common sense is the proximate cause for any subsequent injury, not the equipment itself.

3. Greater than a century's worth of occupational exposure to radiofrequency emissions at orders of magnitude greater than those posed in these proceedings provide clear and convincing evidence that common sense safety precautions existing long before these regulations provided ample safety measures, and that further proceedings along these lines are heedlessly alarmist. Creating a fictional problem, even out of an abundance of caution, where none is shown to exist, is waste, fraud, and abuse of taxpayer and fee-payer funds. Furthermore, there is no need to assume a product is dangerous without proof: in this case, the products being antennas, transmission lines, and transmitters. Again, no nexus exists to establish that people with

common sense cannot share the same environment with radio transmission equipment without suffering ill health effects.

4. Given the foregoing, there is no reason to establish or consider the establishment of any rules or regulations creating more restrictive requirements upon users of the electromagnetic spectrum. Moreover, the cost of existing regulations, given the foregoing, are excessive and unjustified. Finally, further environmental and safety requirements will have a chilling effect against the First Amendment Constitutional rights of licensed users of the radiofrequency spectrum, and therefore, cannot be justified when there is no legitimate state interest to protect absent clear and convincing medical proof of a nexus between R.F. emissions and the claimed health conditions.

WHEREFORE, the undersigned encourages the Commission to adopt fewer and less restrictive R.F. exposure standards unless and until such time as conclusive medical evidence exists to suggest the contrary position is economically and environmentally justified in light of the chilling effect such regulations have against the 1<sup>st</sup> Amendment Constitutional rights of licensed users of the radiofrequency spectrum.

Respectfully Submitted:



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